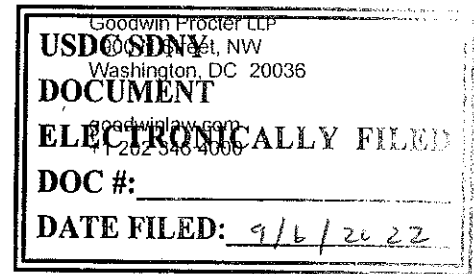




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September 2, 2022

## MEMO ENDORSED

### VIA ECF

The Honorable Lewis A. Kaplan  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

**Granted. SO ORDERED.**

/s/ Lewis A. Kaplan (mab)  
Hon. Lewis A. Kaplan, U.S.D.J.  
Dated: September 6, 2022

**Re: PRCM Advisers LLC, et al. v. Two Harbors Investment Corp., Case No. 1:20-cv-05649-LAK**

Dear Judge Kaplan:

We represent Defendant Two Harbors Investment Corp. ("Two Harbors") in the above-captioned matter. Two Harbors respectfully submits this letter motion (1) to obtain the Court's approval to seal confidential information about Two Harbors' internal computer systems provided in Exhibits 12-13 and 15 filed in connection with Pine River Capital Management L.P.'s Letter Motion to Compel ("Motion") (ECF No. 143) and to redact confidential information about Two Harbors' internal computer systems provided in Exhibits 6-11 and 14 filed in connection with the Motion. Two Harbors does not object to the unsealing of Exhibits 4 and 5 and has filed public versions of those exhibits to be linked to ECF No. 143.

**First,** Two Harbors requests to seal Exhibits 12-13 and 15 that contain confidential information about Two Harbors' internal computer systems. Exhibit 12 is a document titled Two Harbors' 2021 Business Continuity Plan that contains confidential business information and confidential information about Two Harbors' internal computer system infrastructure and server names. Exhibit 13 is an email from K. Patel to J. Breen and A. Diaw dated August 16, 2022, that contains information and descriptions of servers on Two Harbors' internal computer systems. Exhibit 15 is an email from J. Breen to K. Patel dated August 19, 2022, that contains information and descriptions of servers on Two Harbors' internal computer systems. The exhibits filed under seal include sensitive, non-public information concerning Two Harbors' IT infrastructure, servers, applications, and data that, if disclosed to the public, could compromise the security of the infrastructure, servers, applications, and data.

**Second,** Two Harbors requests to redact portions of Exhibits 6-11 and 14 that contain confidential information about Two Harbors' internal computer systems. Exhibit 6 is an email from A. Diaw to K. Patel dated July 19, 2022, that contains information about certain features of Two Harbors' internal computer systems. Exhibit 7 is excerpts of correspondence from K. Patel to J. Breen and A. Diaw dated July 26, 2022, July 28, 2022, July 29, 2022, August 1, 2022, August 2, 2022, August 4, 2022, August 12, 2022, and August 15, 2022, that contain information about certain features of Two Harbors' internal computer systems and names of servers on Two Harbors' internal computer systems. Exhibit 8 is an excerpted transcript of a meet-and-confer dated August 8, 2022, that contains information about certain features of Two Harbors' internal computer systems and information about the infrastructure of Two